

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) Criminal No. 05-10035 PBS (MBB)
)
MARYSOL MORALES)
)
)
)
)

ASSENTED TO MOTION FOR EXCLUSION OF TIME
FROM SPEEDY TRIAL CALENDAR

The United States hereby moves (with the defendant's assent) for an order pursuant to Title 18, United States Code, Section 3161(h)(8)(A), excluding the period from June 15, 2005 through September 27, 2005, from the computation of time within which the trial in this case must commence.

An order permitting such exclusion may properly be entered based upon a finding by the Court that the ends of justice served by granting such an exclusion outweigh the best interests of the public and the defendant in a speedy trial. As grounds for such a finding, the United States notes that the parties have conferred and have agreed – in order to facilitate the orderly preparation of this case for trial – that the United States will make limited disclosure of materials that would ordinarily be subject to automatic discovery at a later date. The interests of justice warrant allowing counsel adequate time, in light of their other professional commitments, to determine which materials will be disclosed and to allow a full

review of those materials, before defendant is required to make final determinations as to whether any motions under Fed. R. Crim. P. 12(c) are warranted.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

dated: August 5, 2005

By: s/ Paul G. Levenson
PAUL G. LEVENSON
Assistant U.S. Attorney
John Joseph Moakley United States Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3147